



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



JAN 03 2013

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

Re: Notice of Final Action - Minor Title V Permit Modification
District Facility # S-1216
Project # 1122691

Dear Mr. Rios:

The Air Pollution Control Officer has modified the Title V permit for Occidental of Elk Hills by incorporating S-1216-64-4, '158-0 and '159-0. The permits are for two new induced gas flotation (IGF) vessels which will be connected to the vapor control system listed on tank S-1216-64.

Enclosed is the modified Title V permit. The application and proposal were sent to US EPA Region IX on 12/5/12. No comments were received following the District's preliminary decision on this project.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,

David Warner
Director of Permit Services

DW:dbt

Enclosures

Sayed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
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San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



JAN 03 2013

Raymond Rodriguez
Occidental of Elk Hills
10800 Stockdale Hwy.
Bakersfield, CA 93311

**Re: Notice of Final Action - Minor Title V Permit Modification
District Facility # S-1216
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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1216-64-5

EXPIRATION DATE: 08/31/2016

SECTION: NE 23 **TOWNSHIP:** 30S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

3,000 BBL FIXED ROOF WASH TANK SERVED BY A VAPOR CONTROL SYSTEM SHARED WITH S-1216-66, '72, '73, '74, '75, '158 AND '159

PERMIT UNIT REQUIREMENTS

1. The tank shall be maintained in a leak-free condition and equipped with an APCO approved vapor recovery system consisting of a closed system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in a leak-free condition. The VOC control device shall be one of the following: a condensation or vapor recovery system that connects to a gas processing plant, a field gas pipeline, a pipeline distributing PUC quality gas for sale, an injection well for disposal of vapors, or a VOC control device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rule 4623] Federally Enforceable Through Title V Permit
2. The tank shall be equipped with a fixed roof with no holes or openings. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
5. The control efficiency of any VOC destruction device, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case US EPA Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US EPA Method 25A provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of the known analytes/compounds to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4623] Federally Enforceable Through Title V Permit
6. Except as otherwise provided in this permit, operator shall ensure that the vapor control system is functional and is operating as designed at all times. [District NSR Rule and 4623] Federally Enforceable Through Title V Permit
7. VOC emission rate from vapor, light liquid, and light crude oil components associated with vapor recovery piping shall not exceed 0.3 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Fugitive VOC emissions rate shall be calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c, Oil and Gas Production Screening Value Ranges Emission Factors (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit
9. Permittee shall maintain accurate records of fugitive emissions and such records shall be made readily available for District inspection upon request for a period of five years. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. The tank shall comply with the voluntary inspection and maintenance program requirements of conditions 99 through 107 of the Facility-Wide Permit S-1216-0-1. [District Rule 4623] Federally Enforceable Through Title V Permit
11. Permittee shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 4623] Federally Enforceable Through Title V Permit
12. This tank shall be degassed before commencing interior cleaning by following one of the following options: 1) exhausting VOCs contained in the tank vapor space to an APCO-approved vapor recovery system until the organic vapor concentration is 5,000 ppmv or less, or is 10 percent or less of the lower explosion limit (LEL), whichever is less, or 2) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable liquid until 90 percent or more of the maximum operating level of the tank is filled. Suitable liquids are organic liquids having a TVP of less than 0.5 psia, water, clean produced water, or produced water derived from crude oil having a TVP less than 0.5 psia, or 3) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable gas. Degassing shall continue until the operator has achieved a vapor displacement equivalent to at least 2.3 times the tank capacity. Suitable gases are air, nitrogen, carbon dioxide, or natural gas containing less than 10 percent VOC by weight. [District Rule 4623] Federally Enforceable Through Title V Permit
13. During tank degassing, the operator shall discharge or displace organic vapors contained in the tank vapor space to an APCO-approved vapor recovery system. [District Rule 4623] Federally Enforceable Through Title V Permit
14. To facilitate connection to an external APCO-approved recovery system, a suitable tank fitting, such as a manway, may be temporarily removed for a period of time not to exceed 1 hour. [District Rule 4623] Federally Enforceable Through Title V Permit
15. This tank shall be in compliance with the applicable requirements of District Rule 4623 at all times during draining, degassing, and refilling the tank with an organic liquid having a TVP of 0.5 psia or greater. [District Rule 4623] Federally Enforceable Through Title V Permit
16. After a tank has been degassed pursuant to the requirements of this permit, vapor control requirements are not applicable until an organic liquid having a TVP of 0.5 psia or greater is placed, held, or stored in this tank. [District Rule 4623] Federally Enforceable Through Title V Permit
17. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 4623] Federally Enforceable Through Title V Permit
18. Tank steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 4623] Federally Enforceable Through Title V Permit
19. During sludge removal, the operator shall control emissions from the sludge receiving vessel by operating an APCO-approved vapor control device that reduces emissions of organic vapors by at least 95%. [District Rule 4623] Federally Enforceable Through Title V Permit
20. Permittee shall only transport removed sludge in closed, liquid leak-free containers. [District Rule 4623] Federally Enforceable Through Title V Permit
21. Permittee shall store removed sludge, until final disposal, in vapor leak-free containers, or in tanks complying with the vapor control requirements of District Rule 4623. Sludge that is to be used to manufacture roadmix, as defined in District Rule 2020, is not required to be stored in this manner. Roadmix manufacturing operations exempt pursuant to District Rule 2020 shall maintain documentation of their compliance with Rule 2020, and shall readily make said documentation available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

22. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit
23. Formerly S-3506-1-0.
24. Formerly S-1641-69.
25. Formerly S-382-798.

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1216-158-1

EXPIRATION DATE: 08/31/2016

EQUIPMENT DESCRIPTION:

INDUCED GAS FLOATATION VESSEL SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1216-64

PERMIT UNIT REQUIREMENTS

1. Tank shall vent only to vapor control system listed on S-1216-64. [District Rule 2201] Federally Enforceable Through Title V Permit
2. All tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623, 5.3.2] Federally Enforceable Through Title V Permit
3. All piping, valves, and fittings shall be constructed and maintained in a Leak-Free condition. [District Rules 2201 and 4623, 5.6.3] Federally Enforceable Through Title V Permit
4. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A reading in excess of 10,000 ppmv above background or the dripping of organic liquid at a rate of more than 3 drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. VOC fugitive emissions from the components in gas and light oil service from the ISF vessel to the vapor control system trunk line shall not exceed 0.21 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Fugitive VOC emissions rate shall be calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c, Oil and Gas Production Screening Value Ranges Emission Factors (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit
7. All piping, fittings, and valves on this ISF vessel shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
8. If any of the ISF vessel components are found to be leaking, operator shall immediately affix a tag and maintain records of liquid leak and gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
9. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rules 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. Operator shall comply with the following requirements to repair leaking components that have a gas leak >10,000 ppmv (measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane): a. Eliminate the leak within 8 hours after detection; or b. If the leak can not be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and c. Eliminate the leak within 48 hours after minimization; and d. In no event that the total time to minimize and eliminate the leak shall exceed 56 hours after detection. [District Rules 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
11. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the specified timeframes, shall not constitute a violation of the District Rule 4623 (amended May 19, 2005). However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified timeframes, shall constitute a violation of the District Rule 4623 (amended May 19, 2005). [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
12. If a component type for a given tank is found to leak during an annual inspection, operator shall then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, operator shall then revert to annual inspections. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
13. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623 (amended May 19, 2005), even if it is under the voluntary inspection and maintenance program. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
14. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623, 5.7] Federally Enforceable Through Title V Permit
15. Permittee shall comply with all applicable Tank Interior Cleaning Program requirements specified in Section 5.7 of Rule 4623. [District Rule 4623, 5.7] Federally Enforceable Through Title V Permit
16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 1070]
17. The permittee shall keep accurate records of the API gravity of each organic liquid stored in the ISF vessel. [District Rule 4409] Federally Enforceable Through Title V Permit
18. Permittee shall maintain records of number and type of components installed and calculated fugitive emissions. Permittee shall update such records when new components are installed. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070]

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1216-159-1

EXPIRATION DATE: 08/31/2016

EQUIPMENT DESCRIPTION:

INDUCED GAS FLOATATION VESSEL SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1216-64

PERMIT UNIT REQUIREMENTS

1. Tank shall vent only to vapor control system listed on S-1216-64. [District Rule 2201] Federally Enforceable Through Title V Permit
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